

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

LINDA WILLIAMS SHELTON,)
)
Plaintiff,)
)
v.) Civil Action No.: CV-06-719-WKW
)
ALL STATE FREIGHTWAYS, INC.,)
)
Defendant.)

DEFENDANT'S WITNESS LIST AND DEPOSITION DESIGNATION

Come now the defendant Allstate Freightways, Inc. by and through undersigned counsel and lists the following witnesses who may be called to testify at the trial of the above styled cause:

EXPECTED WITNESSES

1. Linda Williams Shelton
220 Friendship Road, Apartment # 7
Tallassee, AL 36078
2. James Dunn
12390 Johnson Mill Road
Crofton, KY 42217
3. Tom Olson
Allstate Freightways, Inc.
2875 Harmony Circle
Brookfield, WI 53045
4. Dr. Patrick Ryan (by deposition)
Montgomery Neurosurgical Associates
1510 Forest Avenue
Montgomery, AL 36106

5. Jane Logan
Advantage Rehab Consulting
2426 Capstone Drive
P.O. Box 11761
Montgomery, AL 36111
6. Blue Cross Blue Shield of Alabama Representative (live or by deposition)
450 Riverchase Parkway East
Birmingham, AL

POTENTIAL WITNESSES

7. Trooper D. Allums (live or by deposition)
Investigating Officer
Congressman Dickenson Drive
Montgomery, AL
8. Harvey Wood (live or by deposition)
114 Lacey Lane
Hopkinsville, KY 42240
9. John Wilcox (live or by deposition)
Director of Operations
Tallapoosa Board of Education
125 North Broadnax Street
Dadeville, AL 36853
10. Joseph Wendell (live or by deposition)
Former Principal Reeltown High School
Notasulga, AL
11. Dr. Melvin Russell (by deposition)
875 Friendship Road
Tallassee, AL 36078
12. Dr. Brad Katz (by deposition)
Center for Pain of Montgomery
432 St. Lukes Drive
Montgomery, AL 36117
13. Ambulance Paramedics which transported Plaintiff (live or by deposition)
14. Any medical or healthcare provider who may have relevant information;

15. Any representative from Allstate Freightways, Inc. who is not specifically referenced above;
16. Any representative from the Retirement Systems of Alabama regarding Ms. Shelton's retirement benefits;
17. Any expert witness to offer rebuttal testimony to plaintiff's experts;
18. Any witness discovered through ongoing discovery who appears to have relevant information;
19. Any witness necessary for impeachment or rebuttal purposes;
20. Any witness listed on the plaintiff's witness list;
21. The defendant reserves the right to supplement this witness list as discovery continues.

DEPOSITION DESIGNATION

The defendants reserve the right to offer the following deposition testimony:

Linda Williams Shelton:

p. 4, lines 9-11; p. 5, lines 12-23; p. 9, line 23 through p. 10, line 11; p. 18, line 16 through p. 19, line 10; p. 21, line 18 through p. 24, line 14; p. 25, lines 5-22; p. 26, line 6 through p. 28, line 2; p. 29, lines 3-13; p. 29, line 20 through p. 30, line 5; p. 30, line 16 through p. 31, line 8; p. 35, line 15 through p. 40, line 18; p. 41, line 20 through p. 57, line 23; p. 58, line 23 through p. 59, line 4; p. 59, line 17 through p. 74, line 3; p. 74, line 10 through p. 90, line 11; p. 91, line 13 through p. 92, line 4; p. 92, line 14 through p. 93, line 4; p. 93, lines 15-21; p. 94, line 3 through p. 109, line 1.

Dr. Patrick Ryan:

Without waiving any objections to portions of the plaintiff's examination, the defendant reserves the right to read Dr. Ryan's deposition in its entirety from p. 4, line 17 through p. 62, line 10.

The defendant reserves the right to use all parts of all depositions as necessary or appropriate for impeachment purposes and reserve the right to introduce depositions of medical providers, healthcare representatives, or other deponents who have yet to be deposed in this case.

Respectfully submitted,

s/Steven K. Herndon (HER028)

Attorney for Defendant

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Tallassee, AL 36078

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s/Steven K. Herndon (HER028)